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In the United States District Court  
Northern District of Illinois, Eastern Division

Jacqueline Fegan,

Plaintiff,

v.

Robert Reid #17285, *et. al*,

Defendants.

No.: 06 cv 6767

Judge Lefkow

Plaintiff's Motion to File Exhibits Under Seal

Jacqueline Fegan moves as follows:

1. Plaintiff will file her Motion for Attorney's Fees and Non-Taxable Costs today, May 3, 2010. In support of her motion, Plaintiff is filing actual billing from the Fegan case and exemplar billing statements from past and current litigation files solely to establish plaintiff's counsel's hourly rates from the outset of this litigation to the present date, the work performed and the non-taxable expenses. The Fegan billing statement and supporting documentation and the exemplar billing statements are contained within Exhibit 1, Exhibit 2 and Exhibit 3, respectively, to Plaintiff's Motion for Attorney's Fees and Non-Taxable Costs.

2. These exemplar billing statements are redacted to protect the identity of plaintiff's counsels' other clients and preserve the attorney-client and work product privileges. Certain of these statements pertain to currently pending litigation and, if exposed to the public eye, could prejudice plaintiff's counsel's other clients by allowing opposing counsel and similar hostile individuals to obtain an unfair advantage by peering into the work performed on these ongoing cases. Similarly, the information contained in the statements corresponding to now-resolved

matters, if exposed to the public, could be exploited and abused by individuals hostile to the interests of plaintiff's counsels' other clients or even counsel.

3. Plaintiff seeks leave to have Exhibit 1, Exhibit 2 and Exhibit 3 of Plaintiff's Motion for Attorney's Fees and Non-Taxable Costs filed under seal so that she may substantiate her motion without doing so at her counsel's other clients' expense, Ms Fegan expense or their own expense.

Wherefore the plaintiff prays that the court grant Plaintiff leave to file her Exhibit 1, Exhibit 2 and Exhibit 3 of Plaintiff's Motion for Attorney's Fees and Non-Taxable Costs under seal and grant such other and further relief as the court determines is warranted.

May 3, 2010

Respectfully Submitted,

Jacqueline Fegan, plaintiff,

By: s/ Karl H. Schook  
One of her attorneys

Certificate of Service

I hereby certify that I served the foregoing using the court's CM/ECF system which will send notification of such filing to the counsel of record.

May 3, 2010

s/ Karl H. Schook  
Karl H. Schook

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